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Of Attorneys for Debtor-in-Possession

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:	Case No. 18-34244-pcm11
CHRISTIAN S. RADABAUGH, SR.,	DEBTOR'S STATEMENT IN ADVANCE OF CASE MANAGEMENT CONFERENCE
Debtor.	

Debtor-in-Possession, Christian S. Radabaugh, Sr. (the "Debtor"), submits this report in advance of the Case Management Conference scheduled for January 9, 2019 at 2:00 p.m. In anticipation of the topics to be discussed, the Debtor submits the following:

1. Debtor's Business Operations and Cash Flow Analysis.

The Debtor operates a cattle ranching and breeding business, a rock quarry, and provides hauling and haying services. The Debtor does not have any employees, but occasionally uses contract labor to maintain his ranch. Attached as Exhibit A is a cash flow analysis prepared on a weekly basis, for the upcoming 120-day period.

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2. Motion for Relief from Stay.

No motions for relief have been filed, and none are anticipated in the foreseeable future.

3. Leases / Executory Contracts.

Debtor leases more than 7,000 acres of grazing land, with rent paid annually each October, in the amount of \$13,500 per year. Debtor anticipates assuming the lease.

4. Prepetition Taxes / Historical Financial Information for the Past Three Years.

Attached as Exhibit B is a summary of the Debtor's historical financial information for the three years prior to the Petition. The Debtor's income is not seasonal, so the summary was prepared on a year-by-year basis.

5. Statement of Income and Expenses since the Filing of the Petition.

Attached as Exhibit C is a statement of the Debtor's income and expenses since the filing of the Petition. Other than the trucking/freight expenses, which were incurred to move Debtor's cattle from Shasta Livestock Auction, the expenses listed on Exhibit C were incurred and paid in the ordinary course of Debtor's business.

6. Employment of Professionals and Estimate of Professional Fees.

As of the date hereof, the Debtor has applied for the authority to employ the law firm of Motschenbacher & Blattner, LLP as general bankruptcy counsel. A monthly budget for these professionals is attached as Exhibit D. Estimated professional fees are as follows:

<u>Estimated Professional Fees:</u>	
Motschenbacher & Blattner, LLP	\$107,500
SGA, CPAs	\$3,500

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These budgets are based on good faith estimates and no assurance can be given that the actual amounts will not exceed the estimates. All professionals reserve the right to amend their budgets or apply for professional fees and/or expenses in excess of the budgeted amounts.

Dated: January 7, 2019.

MOTSCHENBACHER & BLATTNER, LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB No. 074027
Of Attorneys for Debtor

Exhibit A: Projected Cash Flow Budget

	Beginning	12/10/2018	12/17/2018	12/24/2018	12/31/2018	1/7/2019	1/14/2019	1/21/2019
Cash on hand (beginning of week)	\$ 500.00	\$ 500.00	\$ 426,293.17	\$ 411,743.17	\$ 406,293.17	\$ 400,843.17	\$ 412,893.17	\$ 405,643.17

CASH RECEIPTS								
Sales of livestock		\$ 428,793.17				\$ 23,000.00		
Crop sales								
Agricultural program payments								
Crop Sales - Radabaugh Ranch, LLC								
Rock sales								
Trucking custom hauling								
Custom haying								
TOTAL CASH RECEIPTS		\$ 428,793.17				\$ 23,000.00		
Financing (loans, line of credit, etc)								
Total cash available	\$ 500.00	\$ 429,293.17	\$ 426,293.17	\$ 411,743.17	\$ 406,293.17	\$ 423,843.17	\$ 412,893.17	\$ 405,643.17

CASH PAID OUT								
Car and truck expenses		\$ 500.00				\$ 500.00		
Feed								
Fertilizers and lime				\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00
Freight and trucking			\$ 10,000.00					
Gasoline, fuel, and oil			\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00
Insurance (other than health)			\$ 1,800.00				\$ 1,800.00	
Contract Labor				\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00
Rent or lease								
Repairs and maintenance				\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00
Seeds and plants								
Storage and warehousing								
Supplies			\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00
Taxes								
Utilities						\$ 2,500.00		
Veterinary, breeding, and medicine				\$ 2,500.00	\$ 2,500.00	\$ 2,500.00	\$ 2,500.00	
Other expenses and misc.				\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00
SUBTOTAL		\$ 500.00	\$ 12,550.00	\$ 5,450.00	\$ 5,450.00	\$ 8,450.00	\$ 7,250.00	\$ 2,950.00
GP, LLC								
United States Trustee Quarterly Fees								
Shasta Livestock Auction Yard (Feed and other admin expenses)			\$ 2,000.00					
Capital purchases								
Owner Living Expenses (See Schedule J)		\$ 2,500.00				\$ 2,500.00		
TOTAL CASH PAID OUT		\$ 3,000.00	\$ 14,550.00	\$ 5,450.00	\$ 5,450.00	\$ 10,950.00	\$ 7,250.00	\$ 2,950.00
Cash on hand (end of month)	\$ 500.00	\$ 426,293.17	\$ 411,743.17	\$ 406,293.17	\$ 400,843.17	\$ 412,893.17	\$ 405,643.17	\$ 402,693.17

Exhibit A: Projected Cash Flow Budget

1/28/2019	2/4/2019	2/11/2019	2/18/2019	2/25/2019	3/4/2019	3/11/2019	3/18/2019	3/25/2019	4/1/2019	4/8/2019
\$ 402,693.17	\$ 399,418.17	\$ 392,218.17	\$ 387,468.17	\$ 384,518.17	\$ 381,568.17	\$ 433,868.17	\$ 429,118.17	\$ 426,168.17	\$ 423,218.17	\$ 593,018.17

									\$ 150,000.00	
					\$ 32,500.00					
	\$ 1,750.00				\$ 3,500.00				\$ 3,500.00	
					\$ 17,000.00				\$ 17,000.00	
	\$ 3,250.00				\$ 6,500.00				\$ 6,500.00	
					\$ 59,500.00				\$ 177,000.00	
\$ 402,693.17	\$ 399,418.17	\$ 392,218.17	\$ 387,468.17	\$ 384,518.17	\$ 441,068.17	\$ 433,868.17	\$ 429,118.17	\$ 426,168.17	\$ 600,218.17	\$ 593,018.17

	\$ 500.00				\$ 500.00				\$ 500.00	
\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00	\$ 400.00
\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00
		\$ 1,800.00				\$ 1,800.00				\$ 1,800.00
\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00	\$ 1,000.00
\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00	\$ 300.00
\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00	\$ 250.00
	\$ 1,250.00				\$ 1,250.00				\$ 1,250.00	
\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00	\$ 500.00
\$ 2,950.00	\$ 4,700.00	\$ 4,750.00	\$ 2,950.00	\$ 2,950.00	\$ 4,700.00	\$ 4,750.00	\$ 2,950.00	\$ 2,950.00	\$ 4,700.00	\$ 4,750.00
\$ 325.00										
	\$ 2,500.00				\$ 2,500.00				\$ 2,500.00	
\$ 3,275.00	\$ 7,200.00	\$ 4,750.00	\$ 2,950.00	\$ 2,950.00	\$ 7,200.00	\$ 4,750.00	\$ 2,950.00	\$ 2,950.00	\$ 7,200.00	\$ 4,750.00
\$ 399,418.17	\$ 392,218.17	\$ 387,468.17	\$ 384,518.17	\$ 381,568.17	\$ 433,868.17	\$ 429,118.17	\$ 426,168.17	\$ 423,218.17	\$ 593,018.17	\$ 588,268.17

EXHIBIT B
DEBTOR'S HISTORIC FINANCIAL INFORMATION

Farm Income:

	2016	2017	2018
Gross Income	\$904,000	\$932,704	\$702,561
Operating Expenses	(\$939,834)	(\$1,155,275)	Unknown ¹
Net Income	(\$35,834)	(\$222,571)	Unknown

¹ Debtor is currently compiling information for tax purposes, and is unable to provide specific information at this time.

EXHIBIT C
STATEMENT OF POST-PETITION INCOME AND EXPENSES

Cattle Sales Income Received Since Petition:	\$428,793.17
Haying / Hauling Income Received Since Petition:	<u>\$7,554.70</u>
Total Post-Petition Income:	\$436,347.87
Operating Expenses Paid Since Petition:	
• Trucking / Freight:	(\$9,044.00)
• Misc. Expenses:	(\$1,206.35)
• Contract Labor	<u>(\$4,614.86)</u>
Total Expenses:	(\$14,865.21)

EXHIBIT D
PROFESSIONAL FEE ESTIMATES

Professional	December 2018	January 2019	February 2019	March 2019	April 2019	May 2019	Totals
Motschenbacher & Blattner LLP	\$25,000	\$15,000	\$20,000	\$20,000	\$20,000	\$7,500	\$107,500
SGA, CPAs	\$0	\$0	\$0	\$0	\$3,500	\$0	\$3,500